

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
          )  
W. R. GRACE & CO., et al.,         ) Case No. 01-01139 (JKF)  
          ) (Jointly Administered)  
          )  
Debtors.         )

**DEBTORS' MOTION IN LIMINE TO EXCLUDE EVIDENCE  
OF ANY ALLEGED DAMAGES FROM THE ZAI SCIENCE TRIAL**

Debtors W.R. Grace & Co., et al ("Debtors"), by and through their counsel, move this Court for an order excluding from the ZAI Science Trial any evidence of alleged damages proffered by ZAI Claimants,<sup>1</sup> precluding ZAI Claimants' real estate valuation expert, John Kilpatrick ("Kilpatrick"), from testifying in the ZAI Science Trial, and striking any references to Kilpatrick's report that may appear in ZAI Claimants' moving and/or opposition papers, and state the following in support of their motion:

1. For the reasons set forth in the Memorandum in Support of Debtors' Motion *In Limine* to Exclude Evidence of Any Alleged Damages from the ZAI Science Trial which is being filed herewith, and is incorporated by reference herein, the Debtors are entitled to the relief requested herein.

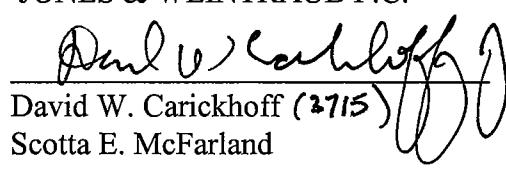
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<sup>1</sup> The "ZAI Claimants" include homeowners Marco Barbanti, Ralph Busch, Paul Price, John and Margery Prebil, William Harris, Jan Hunter, Edward Lindholm, John Sufnarowski, James and Doris McMurchie, and Stephen Walsh on whose behalf proofs of claims alleging property damage from Zonolite Attic Insulation ("ZAI") have been filed in the instant bankruptcy.

WHEREFORE, the Debtors move this Court for an order: excluding from the ZAI Science Trial any evidence of alleged damages proffered by ZAI Claimants; precluding ZAI Claimants' real estate valuation expert, John Kilpatrick, from testifying in the ZAI Science Trial; and striking any references to Kilpatrick's report that may appear in ZAI Claimants' moving and/or opposition papers.

Date: July 7, 2003

PACHULSKI, STANG, ZIEHL, YOUNG,  
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